

Jamie N. Cotter (Wyoming Bar No. 7-4721)
Philip A. Pearlman (Colorado Bar No. 11426)
Ronald L. Fano (Colorado Bar No. 20797)
Spencer Fane LLP
1700 Lincoln Street, Suite 2000
Denver, Colorado 80203
Telephone: (303) 839-3800
Facsimile: (303) 839-3838
jcotter@spencerfane.com
ppearlman@spencerfane.com
rfano@spencerfane.com
Attorneys for Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING**

In re:)
)
RICH GLOBAL, LLC,) Case No. 12-20834
) Chapter 7
Debtor.)

**TRUSTEE'S LISTS OF WITNESSES AND
EXHIBITS FOR HEARING ON APRIL 2, 2019**

Tracy L. Zubrod, trustee, by and through her undersigned counsel, respectfully submits the following lists of witnesses and exhibits for the April 2, 2019 hearing on the Trustee's Motion to Approve Settlement of Disputes between the Trustee and Robert Kiyosaki, Kim Kiyosaki, Pele-Kala Corporation, Cashflow Technologies, Inc., BI Capital, LLC, and Rich Dad Operating Company, LLC.

WITNESSES

The Trustee **will** call:

1. Philip A. Pearlman
2. Tracy L. Zubrod
3. Robert A. Shull

The Trustee **may** call:

4. Any witness listed by any other party.
5. Any witness necessary for impeachment or rebuttal.

EXHIBITS

See the attached list of exhibits.

JUDICIAL NOTICE

The Trustee requests that the Court take judicial notice of the docket sheets and all docket entries (underlying documents) in the following proceedings:

1. *In re Rich Global, LLC*, Case No. 12-20834, in the U.S. Bankruptcy Court for the District of Wyoming.
2. *Tracy L. Zubrod, trustee v. Robert T. Kiyosaki, et al.*, Adv. Pro. No. 14-2021, in the U.S. Bankruptcy Court for the District of Wyoming.
3. *Tracy L. Zubrod, trustee v. Robert T. Kiyosaki, et al*, Case No. 16-cv-00217, in the U.S. District Court for the District of Wyoming.

Dated: March 25, 2019

SPENCER FANE LLP

By: /s/ Philip A. Pearlman
Philip A. Pearlman, CO #11426
Ronald L. Fano, CO #20797
Jamie N. Cotter, WY #7-4721
1700 Lincoln St., Suite 2000
Denver, CO 80203
Telephone: (303) 839-3800
ppearlman@spencerfane.com
rfano@spencerfane.com
jcotter@spencerfane.com

Attorneys for Tracy L. Zubrod, Trustee

CERTIFICATE OF SERVICE

The undersigned certifies that on March 25, 2019, I served by e-mail and other electronic means, a copy of TRUSTEE'S LISTS OF WITNESSES AND EXHIBITS FOR HEARING ON APRIL 2, 2019 and copies of all exhibits on the following:

Jim Belcher
jbelcher@crowleyfleck.com

Schaper, Michael
mschaper@debevoise.com

Megan K.Bannigan,
mkbannigan@debevoise.com

Hank Bailey
hank@performance-law.com

Dale Cottam
dale@performance-law.com

Theodore J.Hartl
hartlt@ballardspahr.com

John F. Young
jyoung@MarkusWilliams.com

Jennifer Salisbury
Jsalisbury@Markuswilliams.com

Robert A. Shull
RShull@dickinson-wright.com

Bradley A. Burns
BBurns@dickinson-wright.com

Amanda E. Newman
ANewman@dickinson-wright.com

Casandra C. Markoff
CMarkoff@dickinson-wright.com

/s/ Philip A. Pearlman, Esq.

Philip A. Pearlman

TRUSTEE'S LIST OF EXHIBITS
April 2, 2019 Evidentiary Hearing

Tracy L. Zubrod, trustee, respectfully submits the following lists of witnesses and exhibits for the April 2, 2019 hearing:

Exh.	Description	Witness	Offered (Yes/No)	Admitted (Yes/No)	Additional Comments
1.	First Amended Complaint				
2.	Settlement Agreement				
3.	Joint Pretrial Memorandum				
4.	Sum. Jud. Warranty Claims – Motion				
5.	Sum. Jud. Warranty Claims – Response				
6.	Sum. Jud. Warranty Claims – Reply				
7.	Sum. Jud. Alter Ego Claim – Motion				
8.	Sum. Jud. Alter Ego Claim – Response				
9.	Sum. Jud. Alter Ego Claim – Reply				
10.	Sum. Jud. Fraud X-fer Claims – Motion				
11.	Sum. Jud. Fraud X-fer Claims – Response				
12.	Sum. Jud. Fraud X-fer Claims – Reply				
13.	Sum. Jud. Omnibus Statement of Facts - Trustee				
14.	Expert Report – Donovan				
15.	Rebuttal Expert Report – Donovan				
16.	Expert Report – Kotzin				
17.	Rebuttal Expert Report - Kotzin				
18.	Daubert re: Kotzin – Motion				
19.	Daubert re: Kotzin – Response				
20.	Daubert re: Kotzin – Reply				
21.	Daubert re: Donovan – Motion				
22.	Daubert re: Donovan – Response				
23.	Daubert re: Donovan – Reply				
24.	Order, Claims against BI Capital				
25.	Order, Fiduciary Duty Claims				
26.	Order, Daubert Motions				
27.	Mediation Procedure Agreement #1				
28.	Mediation Procedure Agreement #2				
29.	Trustee's Form 1 (12/18/19)				
30.	Proof of Claim No. 1, filed by Learning Annex				

31.	Letter, Plate Investment, 2/13/19				
32.	Motion to Intervene in Garn. Case, Plate				
33.	Emails, Pearlman to LA's Attys, re Plate				
34.	Email, Pearlman to LA's Attys, re lowest pt.				

The Trustee reserves the right to use any exhibits endorsed by the Debtor or any other party.

The Trustee reserves the right to use any exhibits necessary for impeachment or rebuttal.